

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

LOUISIANA HEALTH SERVICE & INDEMNITY
COMPANY D/B/A BLUE CROSS AND BLUE
SHIELD OF LOUISIANA, and HMO LOUISIANA,
INC., on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

JANSSEN BIOTECH, INC., JANSSEN ONCOLOGY,
INC., JANSSEN RESEARCH & DEVELOPMENT,
LLC, and BTG INTERNATIONAL LIMITED,

Defendants

CIVIL ACTION NO. 1:19-cv-00474

MAYOR AND CITY COUNCIL OF BALTIMORE, on
behalf of itself and all others similarly situated,

Plaintiffs,

v.

JANSSEN BIOTECH, INC., JANSSEN ONCOLOGY,
INC., JANSSEN RESEARCH & DEVELOPMENT,
LLC, and BTG INTERNATIONAL LIMITED,

Defendants

CIVIL ACTION NO.: 1:19-cv-00605

IRON WORKERS DISTRICT COUNCIL
(PHILADELPHIA and VICINITY) HEALTH
BENEFIT PLAN, on behalf of itself and all those
similarly situated,

Plaintiffs,

v.

JANSSEN BIOTECH, INC., JANSSEN ONCOLOGY,
INC., JANSSEN RESEARCH & DEVELOPMENT,
LLC, and BTG INTERNATIONAL LIMITED,

Defendants

CIVIL ACTION NO.: 1:19-cv-00642

KENTUCKY LABORERS DISTRICT COUNCIL
HEALTH AND WELFARE FUND, on behalf of itself
and all those similarly situated,

Plaintiffs,

v.

JANSSEN BIOTECH, INC., JANSSEN ONCOLOGY,
INC., JANSSEN RESEARCH & DEVELOPMENT,
LLC, and BTG INTERNATIONAL LIMITED,

Defendants

CIVIL ACTION NO.: 1:19-cv-00658

[PROPOSED] AGREED ORDER

Upon this date, the Court having considered the Plaintiffs' Motion for Appointment of Interim Counsel for the Proposed Class and the supporting memorandum it is hereby

ORDERED THAT:

1. Pursuant to Fed. R. Civ. P. 23(g), the Court designates the following individuals and firms to act as co-lead counsel for the proposed class of purchaser plaintiffs:

Thomas M. Sobol
Lauren G. Barnes
Hagens Berman Sobol Shapiro LLP
55 Cambridge Parkway, Suite 301
Cambridge, MA 02142
Telephone: (617) 482-3700

Sharon K. Robertson
Cohen Milstein Sellers & Toll PLLC
88 Pine Street, 14th Floor
New York, NY 10005
Telephone: (212) 838-7797

Joseph H. Meltzer
Kessler Topaz Meltzer & Check LLP
280 King of Prussia Road
Radnor, PA 19087
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James R. Dugan II
The Dugan Law Firm, LLC
One Canal Place, Suite 1000
365 Canal Street
New Orleans, LA 70130
Telephone: (504) 648-0180

Joe P. Leniski, Jr.
Branstetter, Stranch & Jennings, PLLC
223 Rosa Parks Ave. Suite 200
Nashville, TN 37203
Telephone: (615) 254-8801

2. The Court further designates Hagens Berman Sobol Shapiro LLP and Cohen Milstein Sellers & Toll PLLC to serve as co-chairs of the co-lead class committee.

3. The Co-Chairs of the Co-Lead Committee shall have the following responsibilities:

- (a) convening meetings of purchaser counsel; and
- (b) collecting reports on a periodic basis of contemporaneously kept time and expenses from Zytiga Purchaser counsel.

4. Co-lead counsel, working together in a coordinated fashion, shall have sole authority over the following matters concerning the respective group of plaintiffs they represent:

- (a) the initiation, response, scheduling, briefing, and argument of all motions;
- (b) determining the scope, order, and conduct of all discovery proceedings;
- (c) making such work assignments among themselves and other counsel as they may deem appropriate;
- (d) retaining experts;
- (e) designating which attorneys shall appear at hearings and conferences with the Court;
- (f) the timing and substance of any settlement negotiations with defendants;
- (g) allocating fees, if any are awarded by the Court;
- (h) communicating and entering agreements with defendants' counsel; and
- (i) other matters concerning the prosecution of the case.

5. Co-lead counsel shall work together to ensure that all work necessary to prosecute this action is allocated based on the skills and abilities of counsel representing the purchaser class, and that such decisions shall not be made on the basis of whether a firm is, or is not, co-lead counsel.

6. All counsel for the purchaser class plaintiffs must keep contemporaneous time records and shall, on a monthly basis, submit them, along with summaries of any expenses to co-lead counsel or their designee.

IT IS SO ORDERED.

Dated: _____, 2019

United States District Judge
Eastern District of Virginia